

Exhibit D

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9 CALIFORNIANS FOR
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11 *Appearing pro se*
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16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**

18 CALIFORNIANS FOR ALTERNATIVES TO Case No.: 3:24-cv-06632-SI
19 TOXICS,

20 Plaintiff,

21 v.

22 TRAVIS MOREDA DAIRY and TRAVIS
23 MOREDA,

24 Defendants.

25 **STIPULATION TO EXTEND TIME TO**
26 **FILE MOTION FOR FEESRESPOND TO**
27 **COMPLAINT AND COSTSTO DATES IN**
28 **ORDER SETTING INITIAL CASE**
MANAGEMENT CONFERENCE AND
ADR DEADLINES; [PROPOSED] ORDER
THEREON

Honorable Susan Illston

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1 WHEREAS, Plaintiff Californians for Alternatives to Toxics filed a complaint (ECF
2 No.1) on September 20, 2024, and Defendants Travis Moreda Dairy and Travis ~~Moreda-~~
3 ~~responsive pleadings~~Moreda's response are due November 25, 2024 (*see* ECF No. 7 (Waiver of
4 Service of Summons));

5 WHEREAS, the Parties seek additional time to explore settlement opportunities;

6 WHEREAS, Defendants' ~~responsive pleading~~response to the complaint is due during the
7 Thanksgiving holiday;

8 WHEREAS, the Parties therefore wish to stipulate to extend, by a period of
9 approximately thirty days, the time within which Defendants must file their ~~responsive-~~
10 ~~pleading~~response from November 25, 2024 to December 27, 2024, and all other dates in the
11 Court's Order Setting Initial Case Management Conference and ADR Deadlines by
12 approximately thirty days;

13 WHEREAS, the Parties also wish to stipulate to extend, by a period of thirty days, the
14 time within which Plaintiff may file an opposition to Defendants' ~~responsive pleading~~response,
15 should such an opposition be appropriate and necessary;

16 WHEREAS, pursuant to Local Rule 6-2, this stipulation is accompanied by a declaration
17 setting forth with particularity, the reasons for the requested enlargement of time (to allow
18 further settlement discussion and to account for intervening holidays), all previous time
19 modifications in the case (none), and the effect the requested time modification would have on
20 the schedule for the case (none) (See Declaration of William N. Carlon in Support of Stipulation
21 to Extend Time, filed herewith);

22 THEREFORE, it is hereby stipulated and agreed, by and among the Parties, through their
23 undersigned attorneys of record, subject to the approval of the Court, that there is good cause for
24 the following:

1. ~~There is good cause to extend the time within which~~ Defendants shall have an extension to file its responsive pleading pursuant to Rule 12 ~~their response to the complaint~~, from November 25, 2024 to December 27, 2024;

2. There is good cause to extend the time within which Plaintiff shall ~~have to~~ file an opposition to Defendants' ~~responsive pleading~~ response, if applicable, by a period February 3, 2025;

3. The deadline for the Parties to meet and confer pursuant to Federal Rule of thirty days Civil Procedure 26(f) will be extended from December 23, 2024 to January 22, 2025;

4. The deadline for the Parties to make initial disclosures will be extended from January 3, 2025 to February 3, 2025;

5. The deadline for the Parties to file their Joint Case Management Statement will be extended from January 3, 2025 to February 3, 2025;

~~2.6.~~ The date for the Court to hold its initial Case Management Conference will be extended from January 10, 2025 to February 14, 2025 or another date thereafter at the Court's convenience.

IT IS SO STIPULATED.

Dated: November 19, 2024

LAW OFFICE OF WILLIAM CARLON

By: /s/ William N. Carlon

William N. Carlon
Attorney for Plaintiff
Californians for Alternatives to Toxics

Dated: November 19, 2024

TRAVIS MOREDA DAIRY

By: /s/ Travis Moreda

Travis Moreda, d.b.a. Travis Moreda Dairy
Appearing Pro Se

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STIPULATION EXTENDING TIME

Case No. 3:24-cv-06632-SI

ORDER

**ORDER ON STIPULATION TO ~~EXTEND TIME TO FILE RESPONSIVE~~
~~PLEADING~~ RESPOND TO COMPLAINT AND ~~OPPOSITION THERETO~~ DATES IN
ORDER SETTING INITIAL CASE MANAGEMENT CONFERENCE AND ADR
DEADLINES**

Good cause appearing, and PURSUANT TO STIPULATION₇:

1. Defendants shall have an extension to file their response to the complaint, from
November 25, 2024 to December 27, 2024;

2. Plaintiff shall file an opposition to Defendants' response, if applicable, by
February 3, 2025;

3. The deadline for the Parties to meet and confer pursuant to Federal Rule of Civil
Procedure 26(f) will be extended from December 23, 2024 to January 22, 2025;

4. The deadline for the Parties to make initial disclosures will be extended from
January 3, 2025 to February 3, 2025;

5. The deadline for the Parties to file their Joint Case Management Statement will be
extended from January 3, 2025 to February 3, 2025;

6. The date for the Court to hold its initial Case Management Conference will be
extended from January 10, 2025 to _____.

IT IS SO ORDERED₂.

Dated: _____

Susan Illston
United States District Judge

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STIPULATION EXTENDING TIME

Case No. 3:24-cv-06632-SI

ATTESTATION FOR E-FILING

I hereby attest pursuant to Civil L.R. 5-1(i)(3) that I have obtained concurrence in the filing of this document from the other Signatory prior to filing.

DATED: November 19, 2024

By: /s/ William N. Carlon